

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

SECURITIES AND EXCHANGE)
COMMISSION,)
Plaintiff,)
vs.)
REX VENTURE GROUP, LLC)
d/b/a ZEEKREWARDS.COM, and)
PAUL BURKS,)
Defendants,)
No. 3:12-CV-519

**MOTION TO UNSEAL RECEIVER'S SEALED MOTION AND MEMORANDUM AND
COURT'S SEALED ORDER**

Kenneth D. Bell, Court-appointed Receiver (“Receiver”) of Rex Venture Group, LLC d/b/a ZeekRewards.com (“RVG” or “Rex Venture Group”), respectfully requests that the Court unseal the Sealed Motion and Memorandum submitted to the Court on Thursday, February 11, 2016, along with the Sealed Order signed and issued by the Court on Friday, February 12, 2016.

The Receiver reports that the funds subject to the Court's Sealed Order have been frozen, and pursuant to the Sealed Order, the previously sealed filings may now be unsealed and filed in the Court's electronic docket.

Respectfully submitted this 16th day of February, 2016.

By: /s/ *Matthew E. Orso*
Kenneth D. Bell
N.C. State Bar No. 10800
Matthew J. Hoefling
N.C. State Bar No. 29272
Matthew E. Orso
N.C. State Bar No. 42409
MC GUIREWOODS LLP
201 North Tryon Street, Suite 3000 (28202)
Post Office Box 31247
Charlotte, North Carolina 28231
Telephone: 704-373-4620
Facsimile: 704-373-8836
kbell@mcguirewoods.com

Jennifer L. Farer
Admitted *pro hac vice*
MC GUIREWOODS LLP
2001 K Street NW
Suite 400
Washington, DC 20006
Telephone: 202-857-1708
Facsimile: 202-828-3336
jfarer@mcguirewoods.com

*Court-appointed Receiver for Rex Venture
Group, LLC d/b/a ZeekRewards.com*

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing electronically, which will serve the attorneys for parties authorized to receive service through the Court's electronic docketing system.

This the 16th day of February, 2016.

/s/ Matthew E. Orso

Matthew E. Orso